

**COUNTYWIDE INTEGRATED WASTE MANAGEMENT PLAN
FIVE-YEAR REVIEW REPORT**

for the

COUNTY OF SACRAMENTO

prepared by the

DEPARTMENT OF WASTE MANAGEMENT & RECYCLING

August 18, 2003

The County of Sacramento Department of Waste Management & Recycling
authorized the preparation of this Report by:

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August 18, 2003

Mr. Kyle Pogue
Office of Local Assistance
California Integrated Waste Management Board (CIWMB)
P. O. Box 4025
Sacramento, California 95812-4025

**Subject: County of Sacramento Countywide Integrated Waste Management Plan (CIWMP)
Five-Year Review Report**

Dear Mr. Pogue,

On behalf of the cities and county, please find attached a copy of the "CIWMP Five-Year Review Report". In conformance with Section 41822 of the Public Resources Code (PRC), the County and cities have reviewed the Countywide Integrated Waste Management Plan (CIWMP).

The County's Local Task Force (LTF), referred to as the Solid Waste Advisory Committee (SWAC), submitted written comments to the County in conformance with Section 18788 of Title 14 of the California Code of Regulations (CCR). A copy of the August 5, 2003 SWAC letter is included in Appendix F of the "CIWMP Five-Year Review Report".

The County finds that a revision of the traditional elements of the CIWMP is not necessary at this time. Guided by the current CIWMP, the County and the cities will continue to implement programs and strive to fulfill the goals of the Integrated Waste Management Act. There are, however, two areas of local concern which need to be addressed on a region-wide basis in the near future, namely: (1) funding for regional programs; and (2) planning for a regional approach to integrated waste management in the event of a disaster. Both of these areas of concern have the potential of affecting AB 939 goal achievement in the future. The County will discuss these issues with the cities and SWAC and seek the most appropriate resolution.

Please contact Pat Quinn at (916) 875-7082 if you have any questions or comments.

Respectfully,

A handwritten signature in black ink, appearing to read "David A. Pelsner", with a long, sweeping horizontal line extending to the right.

David A. Pelsner, PE, DEE
Director

cc Mary Poole, City of Citrus Heights; Bob Bailey, City of Folsom; Jennifer Cannel, City of Galt; Judy Cotton, City of Isleton; Harold Duffey and Colleen Laubinger, City of Sacramento; Solid Waste Advisory Committee Members; Jim Greco, California Waste Associates

CHAPTER 1.0 EXECUTIVE SUMMARY

State law requires that each county, and the cities within the county, review their waste management planning documents every five years. The review is to focus on changes in the plans since they were approved. The collection of planning documents is referred to as the "Countywide Integrated Waste Management Plan" (CIWMP). The review is required to be conducted by the 5th year anniversary date from when the California Integrated Waste Management Board (the Board or the CIWMB) approved the CIWMP. The Board approved the Sacramento County CIWMP in 1998. Thus, in 2003, the Sacramento County Local Task Force, which is the Sacramento Cities/County Solid Waste Advisory Committee (SWAC), is required to advise the County on whether the CIWMP needs to be revised. The SWAC reviewed the CIWMP Five-Year Review Report and determined that the planning documents which comprise the CIWMP continue to serve as useful background and reference documents while the annual reports submitted by the County and the cities of Folsom, Galt, Isleton, Citrus Heights, and Sacramento have provided updated information concerning the status of program implementation on a yearly basis. Because the updated information has been provided in the annual reports and the development and implementation of selected and alternative programs is continuing, the SWAC feels that it is not necessary to revise the required elements of the CIWMP at this time. The goals, objectives, and policies in the elements remain accurate and applicable. The status of selected programs has been adequately described in the CIWMB Planning Annual Report Information System (PARIS), which has been included in the annual reports.

The overall framework of the traditional elements of the CIWMP is still applicable. Each city has notified the County that it does not believe a plan revision is necessary at this time. The goals, objectives, policies, waste management infrastructure, funding sources, and responsible administrative organizational units noted throughout the CIWMP still are accurately described. The County finds that a revision of the traditional elements of the CIWMP is not necessary at this time.

There are, however, two areas of local concern, which have the potential of affecting goal achievement on a region-wide basis. These areas include:

- (1) Funding for regional programs; and
- (2) Planning for a regional approach to integrated waste management in the event of a disaster.

Regional program funding for household hazardous waste management programs, closed landfill monitoring and maintenance, and other mutually beneficial regional costs have been affected by new city incorporations. Potentially, funding for regional activities has the potential of adversely affecting AB 939 diversion program implementation and, hence, diversion goal achievement. Wastes generated from disaster events can significantly impact the disposal reduction progress realized throughout the area. The County feels that this is an area where regional cooperation can be fostered through disaster management planning to increase diversion and coordinate effective disaster wastes management.

State law also requires that the CIWMP five-year review address a number of specified "traditional" issues, which are highlighted below in upper case, bold font type.

DEMOGRAPHICS. The calculation of the diversion rates for most of the jurisdictions depends upon CIWMB-established adjustment factors, for example: population, employment,

taxable sales, and the statewide consumer price index. Countywide population and employment have increased 21% and 22%, respectively, from 1990 to 2001. The greatest population increase has occurred in the City of Galt (128%) followed by the City of Folsom (92%); the smallest in the City of Isleton (1%). Taxable sales transactions have increased significantly countywide, averaging 54%. During this 11-year period, the statewide consumer price index (CPI) has increased 35%. These factors are important because they are used to calculate the estimated waste generation in compliance reporting years. Diversion rates are then determined by comparing diversion quantities to estimated waste generation.

QUANTITIES OF WASTE. Estimated waste generation quantities have increased and while reported disposal tonnages have increased modestly countywide, diversion performance has increased notably. In 2000 the City of Isleton and the County/City of Citrus Heights Regional Agency have either met (Isleton) or exceeded the 50% goal whereas cities of Folsom, Galt, and Sacramento have realized diversion rates of 49%, 41%, and 45%, respectively. The cities of Elk Grove and Rancho Cordova have not yet completed and submitted their planning documents to the CIWMB. As a result, for this five-year review, there are no plans from these two cities to assess.

FUNDING SOURCES AND ADMINISTRATIVE RESPONSIBILITIES. Funding and administrative resources have been maintained and, in many instances, expanded through the establishment of new fees and the availability of grants from the CIWMB and the Department of Conservation. However, the County has expressed concern that funds allocated for AB 939 implementation by the County and the cities of Citrus Heights and Sacramento may be affected by regional costs incurred for the closure, postclosure maintenance, and remedial activities at closed landfills.

PROGRAM IMPLEMENTATION. Program implementation, as documented by each jurisdiction in the annual reports, has been sustained, enhanced, and expanded. Nearly all selected programs have been implemented, many have been expanded, and some new programs started. Program implementation has been comprehensively reported by the jurisdictions through the annual reporting process. The annual reports have provided updated information concerning program implementation. The programs being implemented are meeting their goals and objectives.

PERMITTED DISPOSAL CAPACITY. Countywide permitted disposal capacity exceeds the statutory requirement of 15 years with additional capacity being available, out-of-county, if needed.

AVAILABLE MARKETS. Markets for recoverable materials have fluctuated but are available in most cases. Recently the entire county, including all of the cities and the City of West Sacramento, became the Sacramento Regional Recycling Market Development Zone (SRRMDZ), a significant expansion of the prior RMDZ.

IMPLEMENTATION SCHEDULE. Changes in the implementation schedule have occurred but have not significantly affected the ability of the County and cities to realize or pursue planned diversion effectiveness. The annual reports submitted by the jurisdictions have updated the status of program implementation.

OTHER ISSUES. The goals, policies, and objectives stated in the Summary Plan remain applicable and relevant. The Solid Waste Advisory Committee (SWAC) continues to meet

monthly, monitor countywide diversion performance, and provide useful input for the pursuit of AB 939 compliance strategies. Nearly all of the selected and contingent programs have been and are continuing to be implemented. Although a few programs have been revised, overall program implementation has been discussed in the annual reports and the CIWMB Planning Annual Report Information System (PARIS) has been kept updated. The County and cities continue to monitor evolving compliance issues. Diversion studies for the cities of Galt and Sacramento and the County/Citrus Heights Regional Agency are being prepared to more accurately measure diversion performance. It is expected that each jurisdiction will continue to update its annual report to reflect current performance and identify any changes desired in program selection and implementation. The newly incorporated cities of Elk Grove and Rancho Cordova are expected in the near future to develop and submit their AB 939 planning documents or join the regional agency.

Consequently, the County feels that the most effective allocation of available resources at this time is to continue to utilize the existing CIWMP as a planning tool augmented by the annual reports. Countywide resources are best directed toward the development and implementation of programs rather than in revising the traditional elements of the current planning documents. Where feasible and practical, increased efforts may be directed to quantifying (or estimating) diversion tonnages for implemented programs and recoverable materials. For these reasons, the County does not feel that a revision of the traditional elements of the CIWMP is warranted or desirable at this time. However, the County will assess the impacts of two areas of concern, namely: (1) funding for regional programs; and (2) planning for a regional approach to integrated waste management in the event of a disaster. A future update, amendment, or revision, of the CIWMP may be necessary. In the near future the County plans to work with the cities and the SWAC to evaluate these areas of concern and develop a region-wide approach for resolution.

CHAPTER 2.0 INTRODUCTION

The California Integrated Waste Management Act of 1989 (Assembly Bill 939) requires cities and counties in California to reduce the amount of solid waste disposed in landfills by 50% by the year 2000, and thereafter, through source reduction, recycling, and composting activities. Transformation may be used to reduce the wastes sent to landfills by no more than 10% after 1999. The CIWMP is the guiding document for attaining these goals. The content requirements of the CIWMP are identified in PRC 41751.

PRC Section 41822 requires each city and county to review its source reduction and recycling element (SRRE) or the CIWMP at least once every five years to:

- (1) correct any deficiencies in the element or plan;
- (2) comply with the source reduction and recycling requirements established under PRC Section 41780; and
- (3) revise the documents, as necessary.

The CIWMB clarified the five-year CIWMP review process in CCR Section 18788. Section 18788 states that prior to the fifth anniversary of Board approval of the CIWMP, the Local Task Force (LTF) shall complete a review of the CIWMP to assure that the County's waste management practices remain consistent with the hierarchy of waste management practices defined in PRC Section 40051.

The hierarchy stated in PRC 40051 is:

- (1) source reduction;
- (2) recycling and composting; and
- (3) environmentally safe transformation and environmentally safe land disposal.

The text of PRC Sections 41751, 41822, 41780, 40051, 40052, and 41770 are included in Appendix A.

The process identified in CCR 18788 is summarized as follows:

- prior to the 5th anniversary, the LTF shall submit *written comments* on areas of the CIWMP which require revision to the County and the CIWMB;
- within 45 days of receipt of comments, the county shall determine if a revision is necessary and notify the LTF and the CIWMB of its findings in a CIWMP Review Report; and
- within 90 days of receipt of the *CIWMP Review Report*, the CIWMB shall review the County's findings and, at a public hearing, approve or disapprove the county's findings.

CCR 18788 also identifies the minimum issues, which are to be addressed in the *CIWMP Review Report*. They are:

- (A) changes in demographics in the county;
- (B) changes in quantities of the waste within the county;
- (C) changes in funding sources for administration of the countywide siting element and summary plan;
- (D) changes in administrative responsibilities;
- (E) program implementation status;
- (F) changes in permitted disposal capacity and quantities of waste disposed of in the county;
- (G) changes in available markets for recyclable materials; and
- (H) changes in the implementation schedule.

On October 30, 1998 and again on July 21, 2000, the CIWMB Office of Local Assistance sent letters to jurisdictions clarifying the CIWMB's oversight of the five-year revision process. A copy of the July 21st letter and CCR Section 18788 are included in Appendix B of Chapter 7.0 of this *CIWMP Review Report*. The July 21st letter essentially noted that the five-year anniversary is from the date of approval by the CIWMB of the CIWMP; that the CIWMB legal staff determined that jurisdictions can utilize their annual reports to update program information, if a revision is not determined by the jurisdiction to be necessary; and that if a revision is determined to be necessary, it may be submitted with the next annual report.

CHAPTER 3.0 BACKGROUND

The Source Reduction and Recycling Element (SRRE), the Household Hazardous Waste Element (HHWE), and the Nondisposal Facility Element (NDFE) for Sacramento County and the cities of Folsom, Galt, Isleton, and Sacramento plus the Countywide Siting Element (CSE) and the County Summary Plan (SP) comprise the CIWMP. The City of Citrus Heights became an incorporated city on January 1, 1997. Because the city formed a regional agency (RA) with the

County, the County's planning documents were used for the city. The name of the regional agency is Sacramento County/City of Citrus Heights Regional Agency. The RA was approved by the CIWMB on January 27, 1999.

The planning documents for each reporting jurisdiction in the county were approved on the dates shown in Table 3-1.

Table 3-1. Approval Dates of AB 939 Planning Documents for Sacramento County Jurisdictions

Jurisdiction	SRRE	NDFE	HHWE	Siting Element	Summary Plan
City of Elk Grove	BP *	BP *	BP *	N/A	N/A
City of Folsom	7/25/95	7/25/95	7/25/95	N/A	N/A
City of Galt	5/23/95	5/23/95	5/23/95	N/A	N/A
City of Isleton	10/21/97	2/13/97	10/21/97	N/A	N/A
City of Rancho Cordova **	TBD	TBD	TBD	N/A	N/A
City of Sacramento	2/95	2/13/97	2/95	N/A	N/A
County of Sacramento/City of Citrus Heights Regional Agency ***	5/29/96	12/14/94	5/29/96	5/27/98	5/27/98

* Being prepared; to be submitted to the CIWMB in January, 2004.

** To be determined.

*** The Sacramento County/City of Citrus Heights Regional Agency was established in 1999 to meet State integrated waste management planning and reporting requirements.

The CIWMP was approved by the CIWMB on May 27, 1998. Thus, the anniversary date for the first five-year CIWMP review is May 27, 2003.

The County and each city's diversion goal is 50%. No petition for a reduction in the 50% goal has been requested by any of the jurisdictions, other than the City of Galt, which was granted a temporary alternative diversion requirement of 48% through the end of 2003 by the CIWMB.

CHAPTER 4.0 PURPOSE

The purpose of this *CIWMP Review Report* is twofold:

- (1) to document the compliance of Sacramento County and the cities with PRC 41822 and CCR 18788; and
- (2) to solicit a wider review, solicit recommendations, and encourage support for diversion program implementation by the jurisdictions in Sacramento County to achieve increased levels of diversion.

CHAPTER 5.0 LOCAL TASK FORCE REVIEW

The Sacramento Cities/County Solid Waste Advisory Committee (SWAC) is the Local Task Force formed pursuant to the regional planning requirements of State law. SWAC meets periodically, generally every month on the first Tuesday. The membership of the SWAC is identified in Appendix C. At the SWAC June 3rd, 2003 meeting, the five-year CIWMP review was agendaized and discussed. A copy of the outline of the presentation, which was provided to the SWAC members, is included in Appendix D. The SWAC discussed the process and requested that a summary of the CIWMP review, conducted by California Waste Associates (CWA), be presented at its August 5, 2003 meeting. CWA reviewed the planning documents for each jurisdiction and the extent that the documents were updated by the annual reports and other

reports prepared by the jurisdictions prior to preparing the summary. CWA presented an overview of the CIWMP review process, the content and adequacy of each of the planning documents, and observations on the current applicability of the CIWMP at the June meeting. A copy of the August meeting presentation outline is included in Appendix E. At its August 5, 2003 meeting, the SWAC approved a letter to the County transmitting the SWAC's written comments. A copy of the SWAC letter is included in Appendix F. A copy was forwarded to the CIWMB.

CHAPTER 6.0 CCR SECTION 18788 (a) (3) (A) THROUGH (H) ISSUES

CITY/COUNTY REVIEW OF PLANNING DOCUMENTS

The cities of Galt, Folsom, Isleton, and Sacramento and the county reviewed their respective planning documents. Each prepared a letter reporting the results of the review. None felt that a revision of the traditional CIWMP elements is necessary at this time. Copies of the letters are presented in Appendix G.

OVERVIEW

CWA reviewed each CIWMP component plan element and found that the documents, accompanied by the annual reports, continue to serve as appropriate reference tools for implementing and monitoring compliance with AB 939. The Summary Plan adequately summarizes the solid waste and household hazardous waste management infrastructure within the county.

The goals, objectives, and policies in the elements are still applicable and consistent with PRC 40051 and 40052. The selected programs for each component were reviewed. Nearly all programs were being implemented. The annual reports and the Planning Annual Report Information System (PARIS) for the County and each city are up to date. Although there have been some changes in program implementation, schedules, costs, and results, these changes are not considered to be significant. Furthermore, it is felt that continued emphasis on program development, evaluation, and implementation are more important than refining the CIWMP documents through a revision. The diversion performance for each city and the County/City of Citrus Heights Regional Agency is tracked in Table 6-1.

Table 6-1. Diversion Rate Trends (1995-2001) *

Year	Folsom	Galt	Isleton	Sacramento	County/CH RA
1995	48%	N/A **	18%	45%	No Data ***
1996	55%	N/A **	31%	45%	No Data ***
1997	52%	N/A **	41%	49%	25%
1998	56%	41%	54%	47%	30%
1999	45%	40%	41%	42%	47%
2000	49%	41%	50%	45%	55%
2001	49%	38%	59%	53%	59%

* Source: CIWMB Website - Diversion Measurement for 1995-2000.

** N/A – not applicable because the city modified its original base year by establishing a new 1998 base year.

*** No data available on the CIWMB website; probably because of the newly established regional agency.

A diversion survey and waste generation study for the year 2000 was conducted for the County/City of Citrus Heights Regional Agency (RA) in support of a generation-based diversion measurement calculation (55%). If the RA's 2000 waste generation study were viewed as its base

year waste generation, the RA diversion rate for 2001 would be 59%. The RA plans to request a new 2001 base year from the CIWMB later this year.

The cities of Galt and Isleton submitted modifications to their reported 2001 disposal quantities to the CIWMB. If accepted, their 2001 diversion rates would be 38% (Galt) and 55% (Isleton). Additionally, the City of Galt is conducting a diversion study/waste generation study in support of a new 2001 base year. The request for the 2001 base year is expected to be submitted to the CIWMB during the later half of 2003. The City of Sacramento recently completed a diversion study/waste generation study in support of a new 2001 base year. The request has been submitted to the CIWMB. As submitted, the study results in a 53% diversion rate for 2001.

Table 6-2 depicts the updated waste generation estimates and disposal quantities for 2001 for all jurisdictions. The resulting countywide diversion rate is 57%. Table 6-3 illustrates the improvement in diversion performance from 1990.

Table 6-2. 2001 Diversion Rates for Sacramento Jurisdictions

Jurisdiction	Waste Generation (tons)	Disposal (tons)	Diversion (tons)	Diversion Rate
Folsom	84,139	42,687	41,452	49%
Galt	19,080	11,816	7,264	38%
Isleton	1,489	663	826	55%
Sacramento	1,045,597	486,858	558,739	53%
County/CH RA	1,609,152	657,161	951,991	59%
Countywide	2,759,457	1,199,185	1,560,272	57%

Table 6-3. 1990 versus 2001 Diversion Rates for Sacramento Jurisdictions

Jurisdiction	1990 Diversion Rate	2001 Diversion Rate	% Improvement
Folsom	9%	49%	443%
Galt	7%	38%	411%
Isleton	4%	55%	1,275%
Sacramento	22%	53%	145%
County/CH RA	12%	59%	408%
Countywide	16%	57%	255%

DEMOGRAPHICS

Table 6-4 depicts demographic trends from 1990 to 2001. The data was obtained from the CIWMB website (default adjustment factors). Most of the cities and the County have experienced notable growth, which has induced increased waste generation.

Table 6-4. Demographic Trends (1990-2001)

Demographic Factor/Jurisdiction	1990	2001	% Change
Population			
Folsom	29,802	57,166	92%
Galt	8,889	20,259	128%
Isleton	833	844	1%
Sacramento	369,365	418,711	13%
County/Citrus Heights Regional Agency	632,330	761,855	20%
Countywide	1,041,219	1,258,835	21%
Employment			
Countywide	468,500	573,100	22%
Taxable Sales (Total)			
Folsom	\$232,275,000	\$1,202,827,000	418%
Galt	\$42,014,000	\$78,621,000	87%
Isleton	\$11,035,000	\$12,849,000	16%
Sacramento	\$3,460,980,000	\$5,012,383,000	45%
County/Citrus Heights Regional Agency	\$5,577,563,000	\$8,011,920,000	44%
Countywide	\$9,323,867,000	\$14,318,600,000	54%
Consumer Price Index (CPI)			
Statewide	135.0	181.7	35%

QUANTITIES OF WASTE

Waste Generation. CIWMB-approved base year waste generation quantities are presented in Table 6-5 for each jurisdiction. The per capita waste generation rate in pounds per person per day (ppd) was calculated for residential and total waste generation. The statewide average per capita in 1990 for total waste generation was approximately 8 ppd; for residential waste per capita, the average is about 3 ppd.

Table 6-5. Base Year Per Capita Waste Generation Analysis

Parameter	Folsom	Galt	Isleton	Sacramento	County/CH RA
Base Year (BY)	1990	1998	1990	1990	1990
BY Waste Generation (tons)	35,355	16,550	1,222	694,074	870,916
BY Population	29,802	17,300	833	369,365	632,330
BY Per Capita (ppd)	6.50	5.24	8.04	10.30	7.55
BY Waste Generation Residential Percentage	50%	44%	46%	50%	52%
BY Residential Waste Generation (tons)	17,678	7,282	562	347,037	452,876
BY Residential Per Capita (ppd)	3.25	2.31	3.70	5.15	3.92

Whereas the per capita total waste generation rates within the cities of Folsom and Galt are notably below the statewide average, the City of Sacramento's total waste generation per capita is higher than the statewide average. The RA's waste generation per capita is slightly less than the statewide average. Waste generation is significant because it establishes the reference level from which disposal reduction and diversion are measured.

Waste Disposal. Disposal quantities estimated for the base year and reported for the period 1995-2001, according to the CIWMB Disposal Reporting System (DRS), are compiled in Table 6-6 for each jurisdiction.

Table 6-6. Disposal Tonnage Trends (1995-2001) *

Year	Folsom	Galt	Isleton	Sacramento	County/CH RA	Countywide
1990	32,146	8,344	1,170	542,739	769,545	1,353,944
1995	25,483	10,519	995	389,135	692,864	1,118,996
1996	23,563	9,601	859	385,135	659,420	1,078,578
1997	27,979	7,417	741	369,006	674,924	1,080,067
1998	27,925	9,749	485	395,245	725,397	1,158,801
1999	41,211	10,691	815	456,357	679,189	1,188,263
2000	43,567	11,351	727	452,022	690,973	1,198,640
2001	42,685	11,816	663	486,858	657,161	1,199,183

Source: CIWMB Website - Disposal Reporting System (DRS).

The reported disposal tonnage decreased from 1990 through 1996 but has increased slightly from 1996 to 2001, which is likely due to the growth which has occurred in the County from population increases, housing construction, and the expansion of the commercial sector.

FUNDING SOURCES

The funding sources identified for jurisdiction in its SRRE are summarized in Table 6-7. Also identified are funding sources (by asterisk) presently used by a jurisdiction, which were not noted in its SRRE.

Table 6-7. AB 939 Program Funding Sources for Sacramento Jurisdictions

Funding Source	Folsom	Galt	Isleton	Sacramento	County/CH RA
Bonds	SRRE	SRRE		SRRE	*
Building Ordinance Fees				SRRE	
Commercial Bank Loans or Lines of Credit					SRRE
County In-kind Services			SRRE		
Developer Fees	SRRE			SRRE	
Franchise Fees	SRRE	*	*	*	*
General Tax Revenues	SRRE		SRRE		
Grants (CIWMB, Dept of Conservation)	SRRE	SRRE	SRRE	SRRE	SRRE
Import Fees on Waste Imported to Kiefer LF					SRRE
Interest on Investments				SRRE	
Material Revenues	SRRE			SRRE	SRRE
Permit Fees (including waste haulers)	SRRE			SRRE	SRRE
Product Fees	SRRE				SRRE
Service Fees/Rates	SRRE	SRRE	SRRE	SRRE	SRRE
Service Fee Surcharge	SRRE	SRRE			

* Not selected in SRRE but currently used as a source of funding AB 939 programs.

No significant changes have occurred in the basic funding sources for the administration of the Countywide Siting Element (CSE) and the Summary Plan. The primary sources of funding diversion programs are through service rates, franchise fees, permit fees, and grants supplemented by general revenues in some cases. Locally based supporting programs for the cities and the county (e.g. public education, municipal staffing, and other local activities) are funded from local refuse collection service rates, franchise fees, grant funds, and other locally

appropriate sources. Since 1990, funding sources have provided sufficient funds for program development, enhancement, and implementation.

The County, however, has indicated in its review, on behalf of the Sacramento County/City of Citrus Heights Regional Agency, that it foresees a funding problem that, if left unresolved, may impact the enhancement and implementation of AB 939 programs. As cities incorporate, some may choose not to contract with the County for residential refuse, recycling, and green waste collection services, thus reducing revenues from residential ratepayers. Some newly incorporated cities may also choose not to join the Sacramento Regional Solid Waste Authority (SWA). The County's residential waste management service fee and the SWA franchise fee are the two funding sources currently used to fund such regional programs as illegal dumping cleanup, household hazardous waste and e-waste collection, and closed landfill monitoring, closure, assessment, maintenance, and remediation. The amount of funding from these two current revenue sources may continue to decrease as cities incorporate and choose not to continue with County-provided residential waste management service and/or choose not to join the Sacramento Regional Solid Waste Authority (SWA). If this funding problem of a shrinking rate base is not resolved, the County and the SWA may no longer be able to fund the diversion programs required by AB 939.

ADMINISTRATIVE RESPONSIBILITIES

Although there has been some reorganization of responsible personnel, no significant changes have occurred in the administration of the CIWMP. Within the County, the Department of Waste Management and Recycling has been the continuing overall responsible agency. Solid waste management activities within each city have been assigned to the following offices:

- City of Folsom Solid Waste Division
- City of Galt City Manager's Office
- City of Isleton City Manager's Office
- City of Sacramento Solid Waste Division

The county and cities have advised the CIWMB of the primary responsible individuals for AB 939 in their annual reports.

PROGRAM IMPLEMENTATION

The Summary Plan of the Sacramento County Integrated Waste Management Plan included goals, policies, and objectives to promote countywide integrated waste management. These goals, policies, and objectives listed below are still applicable.

Goals. The Summary Plan included the following goals:

- *Waste Management Hierarchy* - Source Reduction, Recycling and Composting, then Transformation and Safe Land Disposal;
- *Joint Projects* - To the Extent Feasible, the Cities and County will work together;
- *Market Development* - Working to provide a Secure Outlet for Recyclables;
- *Recycled Purchases* - Increase Recycled Purchases;
- *Household Hazardous Waste* - Effectively Manage Household Hazardous Waste;
- *Special Waste* - Effectively Manage Special Wastes; and
- *Increasing Diversion* - Consider Increasing the Diversion Objective.

Policies. The following policies were identified in the Summary Plan:

- *Environmental Protection* - Provide for effective environmental protection;
- *Enforcement and Monitoring* - Enforce standards and guidelines;
- *Joint Powers Agreement* - City and County of Sacramento JPA;
- *Regional Solid Waste Authority Board (SWA)* - Oversee joint planning of City of Sacramento and County of Sacramento AB 939 programs;
- *Local Task Force* - Continue to support the Solid Waste Advisory Committee; and
- *Regional Facilities* - Establish regional facilities, as needed.

Objectives. Objectives were established focused upon these goals and policies. The objectives stated in the Summary Plan are:

- *Source Reduction* - Reduce waste;
- *Commercial Recycling* - Assist businesses with program development;
- *Curbside Recycling* - Provide curbside service or some equivalent;
- *Source Separation* - Increase collection programs;
- *Backyard Composting* - Encourage backyard composting;
- *Separate Green Waste Collection* - Collect and recycle green waste;
- *Load-Checking Program* - Check loads to prevent household hazardous waste disposal;
- *Material Recovery and Composting Facilities* - Development of regional facilities, as needed; and
- *25% by 1995, 50% by 2000* - Meet state-mandated diversion goals.

Nondisposal Facilities. The following nondisposal facilities, which were identified in the Summary Plan, were utilized for the jurisdictions noted to divert waste materials:

- 28th Street Yard Waste Composting Facility (City of Sacramento);
- California Waste Recovery Systems (now owned by Central Valley Waste Services) Materials Recovery Facility/Composting Facility in Lodi (Cities of Galt, Isleton, and Sacramento and the County of Sacramento);
- Folsom Correctional Resource Recovery Facility (City of Folsom);
- K&M Industries Yard Waste/Wood Waste Processing Facility (Cities of Galt, Isleton, and Sacramento and the County); and
- L&D Recycling Composting Facility (all jurisdictions).

As of July 1st, 2003, the 28th Street Yard Waste Composting Facility, Folsom Resource Recovery Facility, and the Lodi Composting Facility are no longer operating. Additional diversion facilities (not listed in the Summary Plan) but either included in a jurisdiction's amended NDFE or developed since the jurisdictions' nondisposal facility plans were amended include:

- Atlas Disposal Industries, LLC Processing Facility (all jurisdictions) – now closed;
- Elder Creek Transfer and Recovery Facility (all jurisdictions);
- Florin-Perkins Landfill, Inc. Materials Recovery Facility (all jurisdictions);
- Grover Environmental Products/Vernalis Compost Facility in Stanislaus County (cities of Sacramento and Citrus Heights, County)

- Kiefer Landfill (all jurisdictions);
- North Area Recovery Station (Folsom, Sacramento, Citrus Heights, County);
- Sacramento Recycling and Transfer Station (all jurisdictions);
- Scott's Regional Composting Facility in San Joaquin County near Lodi (Galt, Isleton, County)
- South Area Transfer Station (City of Sacramento and County);
- Super Waste Recycling Center (all jurisdictions); and
- Teichert Aggregates Perkins Plant (all jurisdictions).

Many of the nondisposal facilities identified continue to be used by Sacramento County jurisdictions.

Diversion Programs. Table 6-8 identifies the diversion programs selected by each jurisdiction. The annual reports have provided updated information concerning program implementation. Nearly all selected programs have been implemented. The programs being implemented are meeting their goals and objectives.

Public Education, Policy, and Incentive Programs. The following public education and policy programs are being implemented by all of the jurisdictions in the county.

- Electronic (e.g., radio, TV web, hotlines);
- Print (e.g., brochures, flyers, guides, news);
- Outreach (e.g., technical assistance, presentations, awards, fairs, field trips);
- Schools (e.g., education, curriculum);
- Economic Incentives; and
- Ordinances.

Household Hazardous Waste Management Programs. Household hazardous waste programs being implemented by each jurisdiction are identified in Table 6-9. Additionally, many of the jurisdictions' collection programs were expanded to receive electronic waste, including computers, keyboards, printers, printed circuit boards, televisions, typewriters, monitors, servers, telephones, and fax machines.

Programs Scheduled for Implementation but Were Not and A Statement as to Why They Were Not Implemented. Programs, which were selected, but reported in the annual reports as not implemented were minimal. They are included in Table 6-10. Reasons are provided why the dropped programs are no longer being implemented.

Progress of Programs that Were Implemented. The programs, which were implemented through 2001, have been very effective. As reported in the annual reports, nearly all of the Sacramento area jurisdictions have promoted and implemented additional, alternative and new programs. They are identified in Table 6-10.

All selected educational and household hazardous waste management programs have been implemented by the jurisdictions in addition to diversion-promoting policies. Significant changes, which have occurred regarding the implementation of diversion programs, involve "program expansion". The County and cities continue to build upon prior years' experience and the increasing support of the general public to increase diversion quantities.

Contingency Measures Planned to Ensure Compliance with PRC Section 41751.

All of the jurisdictions are concerned about the accuracy of diversion measurement and the resources required to achieve a level of accuracy sufficient to assess program effectiveness. Jurisdiction staff works with CIWMB staff to evaluate options available for diversion measurement and program implementation. Contingency plans are identified in Table 6-10.

Table 6-8. Countywide Diversion Program Implementation in 2001 *

Program	Code	CH	Folsom	Galt	Isleton	Sac City	Sac Co
Xeri/Grasscycling	1000	Yes	Yes		Yes	Yes	Yes
Backyard Composting	1010	Yes	Yes		Yes	Yes	Yes
Business Waste Reduction	1020	Yes		Yes	Yes	Yes	Yes
Procurement	1030	Yes		Yes	Yes	Yes	Yes
School Source Reduction	1040						
Govt Source Reduction	1050	Yes	Yes	Yes		Yes	Yes
Material Exchange/Thrift	1060	Yes	Yes	Yes	Yes	Yes	Yes
Residential Curbside	2000	Yes		Yes	Yes	Yes	Yes
Residential Drop-off	2010	Yes	Yes	Yes	Yes	Yes	Yes
Buyback Centers	2020	Yes	Yes	Yes	Yes	Yes	Yes
Commercial Onsite Pickup	2030	Yes	Yes	Yes	Yes	Yes	Yes
Commercial Self haul	2040			Yes			
Schools	2050	Yes		Yes	Yes		Yes
Government Recycling	2060		Yes	Yes		Yes	
Special Collection/Seasonal	2070	Yes	Yes	Yes	Yes		Yes
Special Collection Events	2080	Yes			Yes	Yes	Yes
Other Recycling	2090					Yes	
MRF	7000		Yes	Yes	Yes	Yes	
Landfill	7010	Yes			Yes		Yes
ADC	7040	Yes					Yes
Residential Curbside GWC	3000	Yes	Yes	Yes	Yes	Yes	Yes
Residential GW Self haul	3010		Yes		Yes		
Commercial Onsite GW P/U	3020		Yes				
Commercial GW Self haul	3030	Yes	Yes				Yes
Food Waste Composting	3040						
School Composting	3050						
Government Composting	3060	Yes			Yes		Yes
Compost Facility	7030	Yes	Yes	Yes	Yes	Yes	Yes
Other Composting	7050			Yes			
Sludge	4010					Yes	
Tire Recycling	4020	Yes	Yes	Yes	Yes	Yes	Yes
White Goods	4030	Yes	Yes	Yes	Yes	Yes	Yes
Scrap Metal	4040		Yes		Yes	Yes	
Wood Waste	4050	Yes	Yes		Yes	Yes	Yes
Concrete, Asphalt, Rubble	4060	Yes	Yes	Yes		Yes	Yes
Rendering	4090	Yes	Yes	Yes	Yes	Yes	Yes
Biomass/Cogeneration	8010	Yes					Yes
Transformation/Tires	8020	Yes		Yes			Yes
Other Transformation	8030						

Information obtained from CIWMB PARIS and jurisdictions' 2001 annual reports.
 Programs being evaluated prior to selection for SRRE and HHWE approval.

Table 6-9. Household Hazardous Waste Management Program Implementation in 2001 *

Program	Code	CH	Folsom	Galt	Isleton	Sac City	Sac Co
Permanent HHW Facility	9000	Yes	Yes	Yes	Future	Yes	Yes
Mobile or Periodic Collection	9010	Yes	Yes	Yes	Yes	Dropped in favor of permanent facilities	
Curbside Collection	9020	Yes	Yes	Yes	Yes	Yes	Yes
Waste Exchange	9030			Yes	Yes	Yes	
Education Programs	9040	Yes	Yes	Yes	Yes	Yes	Yes

Information obtained from CIWMB PARIS and jurisdictions' 2001 annual reports.
Programs being evaluated prior to selection for SRRE and HHWE approval.

Table 6-10. Program Analysis – Additions, Dropped, and Contingencies

Jurisdiction	Programs Not Selected in SRRE but Added Since SRRE Approval	Programs Selected but Not Implemented	Contingency Programs
Folsom	Grasscycling Tire Recycling Scrap Metal	Residential Curbside ⁽¹⁾ Residential and commercial drop-off sites ⁽²⁾	Residential Curbside ⁽³⁾ Expanded focus on C&D diversion.
Galt	Commercial self-Haul	None	Re-evaluate goals. Assess accuracy of base yr waste generation.
Isleton	Grasscycling Business Waste Reduction Procurement Commercial Onsite P/U School Recycling Government Composting Rendering	Commercial Self-Haul Green Waste ⁽⁴⁾ Ordinances ⁽⁵⁾	Assess accuracy of reported disposal.
Sacramento	Grasscycling	Ash Diversion ⁽⁶⁾ Mobile/Periodic HHW Collection ⁽⁷⁾	Assess accuracy of reported disposal. Assess accuracy of base yr waste generation.
County/Citrus Heights RA	Grasscycling Special Collection Seasonal	None	Assess accuracy of reported disposal. Assess accuracy of base yr waste generation.

Notes:

1. Blue bag tested; found infeasible.
2. City found privately controlled sites unworkable, continuing to look for feasible publicly controlled sites.
3. City has piloted source-separated collection; expansion possible for future consideration in light of MRF changes or closure.
4. Discontinued because sufficient diversion has been achieved through other programs, very low level of business green waste generation, and opportunity for those businesses with green waste to either participate in the residential green waste collection program or self-haul to drop-off facilities.
5. Selected ordinance was the 30% diversion requirement developed and implemented by the Solid Waste Authority. This ordinance presented legal issues, which would have required additional staff, technical, and enforcement resources, which the city did not have.
6. Almond Growers Association closed their biomass facility; no longer generating ash.
7. Periodic collection ceased due to opening of the permanent facility.

PERMITTED DISPOSAL CAPACITY

The Kiefer Landfill continues to have disposal capacity available for the municipal solid waste generated but not diverted in the county. In its 2001 annual report, the County reported 44 years of available disposal capacity, well in excess of the 15-year disposal capacity-planning requirement of AB 939. The Countywide Siting Element (CSE) is kept current through the County's annual report and continues to be an applicable planning tool.

The goals identified in the CSE are listed as:

- Promote the following waste management practices in order of priority: source reduction (including reduce and re-use), recycling and composting, then environmentally safe transformation and landfill;
- Maximize the use of all feasible source reduction, recycling, and composting options in order to reduce the amount of solid waste that must be disposed of by transformation and land disposal; and
- For wastes that cannot feasibly be reduced at their source, recycled, or composted, the County may use environmentally safe transformation and land disposal.

These goals continue to be applicable. The policies stated in the CSE included:

- (1) Actions to reduce the amount of solid waste that must be disposed will include encouraging all jurisdictions to implement source reduction, recycling and composting programs identified in the County/City Source Reduction and Recycling Elements (SRRE's). If a program has not been implemented by the date identified in the SRRE, the program will be re-evaluated.
- (2) Actions to be taken to complete the expansion of the Kiefer Landfill, if this proves to be the most viable option for ensuring long term disposal capacity, include:
 - coordination with the Kiefer Landfill Citizens Advisory Committee;
 - completion of the redesign of the landfill consistent with a permanent limit of 325 feet (mean sea level) and a footprint of 675 acres;
 - preparation and certification of a supplemental environmental impact report; and
 - acquisition of a buffer zone.
- (3) Actions to be taken in order to identify contingencies for adequate capacity for the required minimum fifteen years include:
 - the evaluation of transferring wastes to landfills outside the County; and
 - the evaluation of additional diversion efforts to reduce the need for disposal capacity.

The 1st and 3rd policies are still applicable. The 2nd policy has been followed and achieved the results intended.

A list of siting criteria was developed and a siting process was described in the CSE, as required by the regulations - both of which are still applicable.

AVAILABLE MARKETS

Markets for recovered recyclable materials have been available. Though the market material quantity supply and demand and resulting market prices often fluctuate, outlets continue to be available.

On February 11, 2003, the CIWMB approved the expansion of the Sacramento Recycling Market Development Zone. The name of the zone was also changed to Sacramento Regional Recycling Market Development Zone (SRRMDZ). The zone was increased in size from 4,500 acres to over 636,000 acres of which more than 27,000 acres are currently zoned "Industrial". This action also increased the number of participating jurisdictions from the cities of Citrus Heights and Sacramento and the County to also include the cities of Elk Grove, Folsom, Galt, Isleton, and West Sacramento (in Yolo County).

IMPLEMENTATION SCHEDULE

Changes in the implementation schedule have occurred but have not significantly affected the ability of the County and cities to realize or pursue planned diversion effectiveness. The annual reports submitted by the jurisdictions have updated the status of program implementation.

OTHER ISSUES

In its plan review, the County raised the concern about the need for a regionally coordinated integrated waste management disaster plan. While a disaster plan is not a required element of the CIWMP, the County suggested the CIWMP five-year review as an opportunity for the jurisdictions within Sacramento County to develop a coordinated regional approach to recycling and disposal alternatives that may be necessary in the event of a disaster. Unless planned, opportunities for diversion of disaster waste may be lost and disposal space consumed will increase.

Since the CIWMP was prepared and approved, there have been three newly incorporated jurisdictions in the county:

- City of Citrus Heights (January 1, 1997)
- City of Elk Grove (July 1, 2000)
- City of Rancho Cordova (July 1, 2003)

The City of Citrus Heights formed a regional agency with the County to meet the planning and reporting requirements of AB 939, and Citrus Heights also became a member of the Regional Solid Waste Authority. The City of Elk Grove has not responded to the invitation made by the SWA in 2000 to join the Authority or to join the SWAC. Elk Grove is currently in the process of developing its own AB 939 planning documents. The new City of Rancho Cordova whose incorporation just became effective on July 1, 2003, has not yet determined how it will assume its AB 939 responsibilities. At the time of the next five-year review of the CIWMP, the effect and impact of diversion program development and implementation on a region-wide basis due to these new cities should be addressed.

CHAPTER 7.0 SUPPLEMENTARY INFORMATION

In this section on the following pages are included the cited correspondence, regulatory requirements, and reports.

Appendix A - Relevant Public Resource Code Sections

Appendix B - July 21, 2000 CIWMB Letter and Applicable CCR Section 18788

Appendix C - SWAC Membership

Appendix D - June 3, 2003 Presentation to SWAC

Appendix E - August 5, 2003 Presentation to SWAC

Appendix F - SWAC Comment Letter on CIWMP Review

Appendix G - Jurisdiction Review Letters

RELEVANT PUBLIC RESOURCE CODE SECTIONS

The requirement for periodic review by jurisdictions of the CIWMP is included in PRC Sections 41822 and 41770. The review requirement references PRC Sections 40051, 40052, 41751, and 41780. The verbatim text of all of these sections is included below.

PRC Section 41822

Each city, county, or regional agency shall review its source reduction and recycling element or the countywide integrated waste management plan at least once every five years to correct any deficiencies in the element or plan, to comply with the source reduction and recycling requirements established under Section 41780, and to revise the documents, as necessary, to comply with this part. Any revision made to an element or plan pursuant to this section shall be submitted to the board for review and approval or disapproval pursuant to the schedule established under this chapter.

PRC Section 41770

- (a) Each countywide or regional agency integrated waste management plan, and the elements thereof, shall be reviewed, revised, if necessary, and submitted to the board every five years in accordance with the schedule set forth under Chapter 7 (commencing with Section 41800).
- (b) Any revisions to a countywide or regional agency integrated waste management plan, and the elements thereof, shall use a waste disposal characterization method that the board shall develop for the use of the city, county, city and county, or regional agency. The city, county, city and county, or regional agency shall conduct waste disposal characterization studies, as prescribed by the board, if it fails to meet the diversion requirements of Section 41780, at the time of the five-year revision of the source reduction and recycling element.
- (c) The board may review and revise its regulations governing the contents of revised source reduction and recycling elements to reduce duplications in one or more components of these revised elements.

PRC Section 41780

- (a) Each city or county source reduction and recycling element shall include an implementation schedule that shows both of the following:
 - (1) For the initial element, the city or county shall divert 25 percent of all solid waste from landfill disposal or transformation by January 1, 1995, through source reduction, recycling, and composting activities.
 - (2) Except as provided in Sections 41783, 41784, and 41785, for the first and each subsequent revision of the element, the city or county shall divert 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting activities.
- (b) Nothing in this part prohibits a city or county from implementing source reduction, recycling, and composting activities designed to exceed these requirements.

PRC Section 40051

In implementing this division, the board and local agencies shall do both of the following:

- (a) Promote the following waste management practices in order of priority:
 - (1) Source reduction.
 - (2) Recycling and composting.
 - (3) Environmentally safe transformation and environmentally safe land disposal, at the discretion of the city or county.
- (b) Maximize the use of all feasible source reduction, recycling, and composting options in order to reduce the amount of solid waste that must be disposed of by transformation and land disposal. For wastes that cannot feasibly be reduced at their source, recycled, or composted, the local agency may use environmentally safe transformation or environmentally safe land disposal, or both of those practices.

PRC Section 40052

The purpose of this division is to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible in an efficient and cost-effective manner to conserve water, energy and other natural resources, to protect the environment, to improve regulation of existing solid waste landfills, to ensure that new solid waste landfills are environmentally sound, to improve permitting procedures for solid waste management facilities, and to specify the responsibilities of local governments to develop and implement integrated waste management programs.

PRC Section 41751

The countywide integrated waste management plan shall include a summary of significant waste management problems facing the county or city and county. The plan shall provide an overview of the specific steps that will be taken by local agencies, acting independently and in concert, to achieve the purposes of this division. The plan shall contain a statement of the goals and objectives set forth by the countywide task force created pursuant to Chapter 1 (commencing with Section 40900).

JULY 21, 2000 CIWMB LETTER & APPLICABLE CCR SECTION 18788

A copy of the July 21, 2000 correspondence regarding the "Five-Year Revision Process" sent to all city/county contacts from Ms. Cara Morgan, Acting Branch Manager, Office of Local Assistance, CIWMB is included in this appendix. Presented below is the verbatim text of the applicable section of the CCR.

CCR Section 18788. Five-Year Review and Revision of the Countywide or Regional Agency Integrated Waste Management Plan.

(a) **CIWMP or RAIWMP Review.** Prior to the fifth anniversary of Board approval of a CIWMP or RAIWMP, or its most recent revision, the LTF shall complete a review of the CIWMP or RAIWMP in accordance with Public Resources Code Sections 40051, 40052, and 41822, to assure that the county's and regional agency's waste management practices remain consistent with the hierarchy of waste management practices defined in Public Resources Code, Section 40051.

(1) Prior to the fifth anniversary of Board approval of the CIWMP or RAIWMP, the LTF shall submit written comments on areas of the CIWMP or RAIWMP, which require revision, if any, to the county or regional agency and the Board.

(2) Within 45 days of receiving LTF comments, the county or regional agency shall determine if a revision is necessary, and notify the LTF and the Board of its findings in a CIWMP or RAIWMP Review Report.

(3) When preparing the CIWMP or RAIWMP Review Report the county or regional agency shall address at least the following:

- (A) changes in demographics in the county or regional agency;
- (B) changes in quantities of waste within the county or regional agency;
- (C) changes in funding sources for administration of the Siting Element and Summary Plan;
- (D) changes in administrative responsibilities;
- (E) programs that were scheduled to be implemented but were not, a statement as to why they were not implemented, the progress of programs that were implemented, a statement as to whether programs are meeting their goals, and if not what contingency measures are being enacted to ensure compliance with Public Resources Code section 41751;
- (F) changes in permitted disposal capacity, and quantities of waste disposed of in the county or regional agency;
- (G) changes in available markets for recyclable materials; and
- (H) changes in the implementation schedule.

(4) Within 90 days of receipt of the CIWMP or RAIWMP Review Report, the Board shall review the county's or regional agency's findings, and at a public hearing, approve or

disapprove the county's or regional agency's findings. Within 30 days of its action, the Board shall send a copy of its resolution, approving or disapproving the county's or regional agency's findings, to the LTF and the county or regional agency. If the Board has identified additional areas that require revision, the Board shall identify those areas in its resolution.

(b) CIWMP or RAIWMP Revision. If a revision is necessary the county or regional agency shall submit a CIWMP or RAIWMP revision schedule to the Board.

(1) The county or regional agency shall revise the CIWMP or RAIWMP in the areas noted as deficient in the CIWMP or RAIWMP Review Report and/or as identified by the Board.

(2) The county or regional agency shall revise and resubmit its CIWMP or RAIWMP pursuant to the requirements of sections 18780 through 18784 of this article.

(c) The county shall submit all revisions of its CIWMP to the Board for approval. The revised CIWMP shall be reviewed pursuant to the requirements of sections 18784 through 18786 of this article.

(d) The regional agency shall submit all revisions of its RAIWMP to the Board for approval. The revised RAIWMP shall be reviewed pursuant to the requirements of sections 18784 through 18786 of this article.

Note: *Authority: Section 40502 of the Public Resources Code.*

Reference: *Sections 40051, 40052, 41750, 41760, 41770, & 41822 of the Public Resources Code*



California Integrated Waste Management Board

Linda Moulton-Patterson, Chair

8800 Cal Center Drive • Sacramento California 95826 • (916) 255-2200

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Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

July 21, 2000

Jim Greco
County of El Dorado
PO Box 5177
El Dorado Hills, CA 95762

Re: FIVE-YEAR REVISION PROCESS

The purpose of this letter is to clarify the Board's oversight of the five-year revision process. The Board previously sent notification to jurisdictions on October 30, 1998 regarding the Board's oversight of the 5-year revision process. While still maintaining the integrity and intent of AB 939, the Board is also very interested with assisting jurisdictions in the development of efficient and effective planning and reporting processes.

Existing law (PRC Section 41770) states that "each countywide or regional agency integrated waste management plan, and the elements thereof, shall be reviewed, revised, if necessary, and submitted to the Board every five years in accordance with the schedule set forth under Chapter 7 (commencing with Section 41800)." The following items provide specific information regarding the five-year revision process.

- Title 14 of the California Code of Regulations, Sections 18788 provides that the five-year revision schedule is calculated from the date of Board approval of the original Countywide Integrated Waste Management Plan and all its elements, not the approval dates of the individual elements;
- ^{CCR} PRC Section 18788 provides that prior to the fifth anniversary of Board approval of a countywide or regional agency integrated waste management plan (CIWMP or RAIWMP), or its most recent revision, the Local Task Force (LTF) shall complete a review of the CIWMP or RAIWMP in accordance with PRC Sections 40051, 40052, and 41822, to assure that the county's and regional agency's waste management practices remain consistent with the hierarchy of waste management practices defined in PRC Section 40051. The LTF shall submit written comments on areas of the CIWMP or RAIWMP, which require revision, if any, to the county or regional agency and the Board.

- Submittal of a five-year revision is only required if either the Board or the jurisdiction determines that a revision would be necessary "to correct any deficiencies in the element or plan, [and] to comply with the source reduction and recycling requirements established under Section 41780" as required by PRC Section 41822. The Board's Legal staff has determined that jurisdictions can utilize their Annual Reports to the Board to update program information where it has been determined that a revision is not necessary. In addition to the updates in the Annual Report, the LTF comments and the CIWMP/RAIWMP Review Report should be included.
- Jurisdictions that have determined that a five-year revision is necessary may include the revision under cover of the existing Annual Report document that is to be submitted to the Board for that year. The procedures set forth in 14 CCR 18788 must still be complied with before the Board can consider approval of the five-year revision document.

We hope this clarifies any questions you may have regarding the five-year revision process. If you have any questions regarding this process, please feel free to contact your Office of Local Assistance representative at (916) 255-2555.

Sincerely,

Cara Morgan

Cara Morgan, Acting Branch Manager
Office of Local Assistance

Attachment

SWAC MEMBERSHIP

The membership as of April 28, 2003 to the Solid Waste Advisory Committee/AB 939 Local Task Force is:

<u>Representative</u>	<u>Appointing Jurisdiction</u>	<u>Constituency</u>
Carl J. Hauge, 2003 Chair	Sacramento County	Environmental
Patrick Maxfield, 2003 Vice-Chair	City of Folsom	City of Folsom
Alison Dabney	City of Sacramento	Industry
Anthony DiRiggi	City of Sacramento	Environmental/Integrated Waste Management
Evan Edgar	Sacramento County	Integrated Waste Management
Rich Garmsen	Sacramento County	Recycling Business
William Gibson	Sacramento County	Residential Generators/General Public
Jerry Mayberry	Sacramento County	Integrated Waste Management
Elizabeth Rilveria	City of Sacramento.	Residential Generator/General Public
Richard Russell	City of Galt	City of Galt
Donald White	City of Citrus Heights	City of Citrus Heights
Mark White	City of Sacramento	Integrated Waste Management
Vacant	City of Sacramento	Recycling Business
Vacant	City of Isleton	City of Isleton

JUNE 3, 2003 PRESENTATION TO SWAC

Outline of Presentation to Solid Waste Advisory Committee (SWAC) Sacramento County CIWMP Five-Year Review

1. Overview of Statutory Requirement and Process

- Local Task Force (SWAC) Review by 5th Year Anniversary with Any Comments to County and CIWMB (5/27/03)
- County "CIWMP Review Report" to SWAC and CIWMB within 45 days of SWAC Recommendation
- CIWMB Review of "CIWMP Review Report" within 90 days to review and approve or disapprove of County's findings

2. Only 7 CIWMP Reviews Have Been Approved Thus Far (El Dorado County was the 1st on 4/24/01); 31 were due by April 2003.

3. CIWMB Policy has been expressed in July 21, 2000 letter sent to all jurisdictions by Cara Morgan, which states:

"Submittal of a five-year revision is only required if either the Board or the jurisdiction determines that a revision would be necessary 'to correct any deficiencies in the element or plan, to comply with the source reduction and recycling requirements established under section 41780' as required by PRC Section 41822. The Board's Legal staff has determined that jurisdictions can utilize their Annual Reports to the Board to update program information where it has been determined that a revision is not necessary. In addition to the updates in the Annual Report, the LTF comments and the CIWMP Review Report should be included."

4. Meaning of the Term "Revision" – Requires CEQA Review and a Public Review Process with Actions Required by Resolution by City Councils and the Board of Supervisors

5. California Waste Associates (Jim Greco) Will Present Preliminary Findings Concerning:

- 5A Demographics (countywide population, employment changes, and taxable sales transactions changes). These factors affect estimated waste generation.
- 5B Estimated waste generation accuracy.
- 5C, 5D Funding and administrative resources.
- 5E, 5H Program implementation status, as documented by each jurisdiction in their annual reports.
- 5F Countywide permitted disposal capacity.
- 5G Markets for recoverable materials.
- 5I The goals, policies, and objectives stated in the Summary Plan.
- 5J Other relevant issues.

Minimum Issues for CIWMP Five-Year Review Report

Pursuant to CCR Section 18788, when preparing the CIWMP Five-Year Review Report, the County shall address at least:

- (A) Changes in demographics in the county or regional agency;
- (B) Changes in quantities of the waste within the county or regional agency;
- (C) Changes in funding sources for administration of the countywide Siting Element and Summary Plan;
- (D) Changes in administrative responsibilities;
- (E) Programs that were scheduled to be implemented but were not, a statement as to why they were not implemented, the progress of programs that were implemented, a statement as to whether programs are meeting their goals, and, if not, what contingency measures are being enacted to ensure compliance with PRC 41751;
- (F) Changes in permitted disposal capacity and quantities of waste disposed of in the county or regional agency;
- (G) Changes in available markets for recyclable materials; and
- (H) Changes in the implementation schedule

Table 5A - Demographics of Sacramento County Jurisdictions

DEMOGRAPHIC FACTOR	1990	2001	% Change
Population			
Citrus Heights	w/ County	w/ County	w/ County
Elk Grove	w/ County	w/ County	w/ County
Folsom	29,802	57,166	92%
Galt	8,889	20,259	128%
Isleton	833	844	1%
Sacramento	369,365	418,711	13%
Unincorporated County (w/ CH and EG)	632,330	761,855	20%
Countywide	1,041,219	1,258,835	21%
Employment			
Countywide Labor Force Employment	509,700	592,000	16%
Countywide Industrial Employment	468,500	573,100	22%
Taxable Sales Transactions (x \$1,000)			
Citrus Heights	w/ County	w/ County	w/ County
Elk Grove	w/ County	w/ County	w/ County
Folsom	232,275	1,202,827	418%
Galt	42,014	78,621	87%
Isleton	11,035	12,849	16%
Sacramento	3,460,980	5,012,383	45%
Unincorporated County (w/ CH and EG)	5,577,563	8,011,920	44%
Countywide	9,323,867	14,318,600	54%
Consumer Price Index (CPI)			
Statewide	135.0	181.7	35%

Table 5B-1 – Waste Generation, Disposal, and Diversion

WASTE MANAGEMENT ACTIVITY	1990	2001	% Change
Waste Generation (Uncorrected)			
Citrus Heights	w/ County	w/ County	w/ County
Elk Grove	w/ County	w/ County	w/ County
Folsom	35,355	84,139	138%
Galt	9,016	13,584	51%
Isleton	1,222	1,489	22%
Sacramento	694,074	845,780	22%
Unincorporated County (w/ CH and EG)	870,916	1,062,499	22%
Countywide	1,610,583	2,007,491	25%
Waste Generation (Corrected)			
Citrus Heights	w/ County	w/ County	w/ County
Elk Grove	w/ County	w/ County	w/ County
Folsom	35,355	84,139	138%
Galt *	9,016	19,081	112%
Isleton	1,222	1,489	22%
Sacramento **	694,074	1,045,587	51%
Unincorporated County (w/ CH and EG) ***	870,916	1,609,152	85%
Countywide	1,610,583	2,759,458	71%
Disposal			
Citrus Heights	w/ County	w/ County	w/ County
Elk Grove	w/ County	w/ County	w/ County
Folsom	32,146	42,687	33%
Galt	8,344	11,816	42%
Isleton	1,170	610	-48%
Sacramento	542,739	486,858	-10%
Unincorporated County (w/ CH and EG)	769,545	657,161	-15%
Countywide	1,353,944	1,199,132	-11%
Diversion Rate			
Citrus Heights	w/ County	w/ County	w/ County
Elk Grove	w/ County	w/ County	w/ County
Folsom	9%	40%	443%
Galt ****	7%	38% (20%)	411%
Isleton	4%	59%	1287%
Sacramento	22%	53% (42%)	145%
Unincorporated County (w/ CH and EG)	12%	59% (38%)	408%
Countywide	16%	57%	255%

* CIWMB approved a new 1998 base year for the City of Galt.

** CIWMB approved a generation-based calculation for 2000; new base year may be requested.

*** City of Sacramento recently requested a new 2000 base year; under review by CIWMB.

**** City of Galt currently preparing a new 2001 base year waste generation estimate.

Table 5B-2 – 1990 vs. 2001 Diversion Rate

JURISDICTION	1990	2001	% Change
Citrus Heights	w/ County	w/ County	w/ County
Elk Grove	w/ County	w/ County	w/ County
Folsom	9%	49%	443%
Galt *	7%	38% (20%)	411%
Isleton	4%	59%	1287%
Sacramento **	22%	53% (42%)	145%
Uninc County (w/ CH and EG) ***	12%	59% (38%)	408%
Countywide	16%	57%	255%

* CIWMB approved a new 1998 base year for the City of Galt; City currently preparing a new 2001 base year waste generation estimate; to be submitted to CIWMB this year.

** City of Sacramento recently requested a new 2000 base year; under review by CIWMB.

*** CIWMB approved a generation-based calculation for 2000; new base year may be requested.

Table 5E. Countywide Diversion Program Implementation in 2001 *

Program	Code	CH	EG **	Folsom	Galt	Isleton	Sac City	Sac Co
SOURCE REDUCTION								
Xeri/Grasscycling	1000	Yes		Yes		Yes	Yes	Yes
Backyard Composting	1010	Yes		Yes		Yes	Yes	Yes
Business Waste Reduction	1020	Yes			Yes		Yes	Yes
Procurement	1030	Yes			Yes	Yes	Yes	Yes
School Source Reduction	1040							
Govt Source Reduction	1050	Yes		Yes	Yes		Yes	Yes
Material Exchange/Thrift	1060	Yes		Yes	Yes	Yes	Yes	Yes
RECYCLING								
Residential Curbside	2000	Yes			Yes	Yes	Yes	Yes
Residential Drop-off	2010	Yes		Yes	Yes	Yes	Yes	Yes
Buyback Centers	2020	Yes		Yes	Yes	Yes	Yes	Yes
Commercial Onsite Pickup	2030	Yes		Yes	Yes	Yes	Yes	Yes
Commercial Self haul	2040				Yes			
Schools	2050	Yes			Yes	Yes		Yes
Government Recycling	2060			Yes	Yes		Yes	
Special Collection/Seasonal	2070	Yes		Yes	Yes	Yes		Yes
Special Collection Events	2080	Yes				Yes	Yes	Yes
Other Recycling	2090						Yes	
MRF	7000			Yes	Yes	Yes	Yes	
Landfill	7010	Yes				Yes		Yes
ADC	7040	Yes						Yes
COMPOSTING								
Residential Curbside GWC	3000	Yes		Yes	Yes	Yes	Yes	Yes
Residential GW Self haul	3010			Yes		Yes		
Commercial Onsite GW P/U	3020			Yes				
Commercial GW Self haul	3030	Yes		Yes				Yes
Food Waste Composting	3040							
School Composting	3050							
Government Composting	3060	Yes				Yes		Yes
Compost Facility	7030	Yes		Yes	Yes	Yes	Yes	Yes
Other Composting	7050				Yes			
SPECIAL WASTE								
Sludge	4010						Yes	
Tire Recycling	4020	Yes		Yes	Yes	Yes	Yes	Yes
White Goods	4030	Yes		Yes	Yes	Yes	Yes	Yes
Scrap Metal	4040			Yes		Yes	Yes	
Wood Waste	4050	Yes		Yes		Yes	Yes	Yes
Concrete, Asphalt, Rubble	4060	Yes		Yes	Yes		Yes	Yes
Rendering	4090	Yes		Yes	Yes	Yes	Yes	Yes
TRANSFORMATION/BIOMASS								
Biomass/Cogeneration	8010	Yes						Yes
Transformation/Tires	8020	Yes			Yes			Yes
Other Transformation	8030							

* Information obtained from CIWMB PARIS and jurisdictions' 2001 annual reports.

** Programs being evaluated prior to selection for SRRE and HHWE approval.

COUNTYWIDE CIWMP GOALS

1. WASTE MANAGEMENT HIERARCHY – SOURCE REDUCTION, RECYCLING AND COMPOSTING, THEN TRANSFORMATION AND SAFE LAND DISPOSAL
2. JOINT PROJECTS – TO THE EXTENT FEASIBLE, THE CITIES AND COUNTY WILL WORK TOGETHER
3. MARKET DEVELOPMENT – WORKING TO PROVIDE A SECURE OUTLET FOR RECYCLABLES
4. RECYCLED PURCHASES – INCREASE RECYCLED PURCHASES
5. HHW – EFFECTIVELY MANAGE HHW
6. SPECIAL WASTE – EFFECTIVELY MANAGE SPECIAL WASTES
7. INCREASING DIVERSION – CONSIDER INCREASING DIV OBJECTIVE

COUNTYWIDE AB939 OBJECTIVES

- SOURCE REDUCTION – REDUCE WASTE
- COMMERCIAL RECYCLING – ASSIST BUSINESSES W/ PROGRAMS
- CURBSIDE RECYCLING – PROVIDE CURBSIDE SERVICE OR SOME EQUIVALENT
- SOURCE SEPARATION – INCREASE COLLECTION PROGRAMS
- BACKYARD COMPOSTING – ENCOURAGE B/Y COMPOSTING
- SEPARATE GREEN WASTE COLLECTION – COLLECT & RECYCLE GW
- LOAD CHECKING – CHECK LOADS TO PREVENT HHW DISPOSAL
- MATERIAL RECOVERY & COMPOSTING FACILITIES – DEVELOPMENT OF REGIONAL FACILITIES, AS NEEDED
- MEET STATE-MANDATED DIVERSION GOALS

NEXT STEPS

ALL CITIES RESPOND TO COUNTY REQUEST WITH FINDINGS

COUNTY COMPLETES CIWMP FIVE YEAR REVIEW REPORT

1. SWAC SUBMITS COMMENTS TO COUNTY W/ COPY TO CIWMB
2. COUNTY COMPLETES CIWMP FIVE YEAR REVIEW REPORT
3. SWAC SUBMITS COMMENTS TO COUNTY W/ COPY TO CIWMB

AUGUST 5, 2003 PRESENTATION TO SWAC

Mr. Greco, California Waste Associates, briefed the SWAC on August 5th about their responsibilities about the CIWMP Five-Year Review process.

Mr. Greco also reported that the cities of Folsom, Galt, Isleton, Sacramento, and the County provided letters indicating that a revision of their AB 939 planning elements was not necessary at this time. He noted the County, on behalf of the Sacramento County/City of Citrus Heights Regional Agency, did foresee a potential funding problem, if not addressed, which could adversely affect diversion program implementation. The County suggested that further discussion be undertaken by the cities with the County concerning the assessment of regional program funding.

A second issue noted by the County was the need for the development of an integrated disaster waste management plan.



**Sacramento Cities/County Solid Waste Advisory Committee (SWAC) and
Local Task Force (LTF)**

August 5, 2003

Mr. David Pelser, Director
Department of Waste Management and Recycling
County of Sacramento
9850 Goethe Road
Sacramento, California 95827-3561

Subject: Five-Year Review of the Countywide Integrated Waste Management Plan (CIWMP)

Dear Mr. Pelser:

The Cities/County Solid Waste Advisory Committee (SWAC), which serves as the Sacramento County AB 939 Local Task Force, completed the review of the CIWMP as required by Public Resources Code Section 41770 and Title 14 of the California Code of Regulations (Section 18788).

The planning documents which comprise the CIWMP continue to serve as useful background and reference documents while the annual reports submitted by the County and the cities of Folsom, Galt, Isleton, Citrus Heights, and Sacramento have provided updated information concerning the status of program implementation on a yearly basis. Because the updated information has been provided in the annual reports and the development and implementation of selected and alternative programs is continuing, the SWAC feels that it is not necessary to revise the required elements of the CIWMP at this time. The goals, objectives, and policies in the elements remain accurate and applicable. The status of selected programs has been adequately described in the CIWMB Planning Annual Report Information System (PARIS), which has been included in the annual reports.

In its review of the Plan, the County raised two issues of concern regarding future regional program funding and disaster planning. The SWAC supports the County's efforts to work with the other jurisdictions in Sacramento County to develop regional solutions to these issues. The SWAC also encourages the County and cities to work together to assure the availability of funding for region-wide programs and responsibilities and the development of an integrated disaster waste management plan.

If you have any questions, please contact me. Thank you.

Sincerely,



Carl J. Hauge
2003 Chairperson, Cities/County SWAC/LTF

c Kyle Pogue, CIWMB
 Mary Poole, City of Citrus Heights
 Bob Bailey, City of Folsom
 Jennifer Cannell, City of Galt
 Judy Cotton, City of Isleton
 Harold Duffey and Colleen Laubinger, City of Sacramento
 Pat Quinn, Sacramento County
 Jim Greco, California Waste Associates

P:\Shared Folders\Planning\CIWMP\5 Year Review\SWAC comment letter on 5-yr review.doc



CITY OF ISLETON

101 Second Street

P.O. Box 716

Isleton, Sacramento Co., California 956

Tel: (916) 777-77
Fax: (916) 777-77

April 28, 2003

Mr. Patrick M. Quinn
Planning Program Manager
Department of Waste Management & Recycling
County of Sacramento
9850 Goethe Road
Sacramento, California 95827-3561

RE: Countywide Integrated Waste Management Plan Five-Year Review

Dear Mr. Quinn:

I want to acknowledge receipt of your April 4th memorandum regarding the subject matter.

Through the assistance of an independent consultant (Jim Greco, California Waste Associates), the City of Isleton has reviewed its AB 939 plans annually. As you are likely aware, these plans include:

- Source Reduction and Recycling Element;
- Household Hazardous Waste Element; and
- Nondisposal Facility Element.

The City has updated these plans through their AB 939 annual reports submitted to the California Integrated Waste Management Board and does not feel that a revision is necessary at this time.

If you need any additional information, please contact me.

Sincerely,

Judy Cotton

cc Jim Greco, California Waste Associates

CITY OF FOLSOM

Solid Waste Division

Collection / Recycling / Haz Mat
50 Natoma Street
Folsom, California 95630



May 16, 2003

County of Sacramento Public Works Agency
Department of Waste Management & Recycling
Attn: Doug Kobold
9850 Goethe Road
Sacramento, CA 95827-6767

SUBJECT: COUNTY INTEGRATED MANAGEMENT PLAN FIVE-YEAR REVIEW

Dear Doug,

Please accept this letter as the City of Folsom's response regarding input into the Countywide Integrated Waste Management Plan Five-Year Review. At this time, the City's planning documents are sufficient and require no revisions. However, there may be an impending change of direction which may require the City to undertake a full review of all its planning documents. Once program solutions have been determined, the City will notify the State and County of any necessary revisions to its planning documents.

If you have any questions, please contact Richard Shaw at 355-8394.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert D. Bailey", is written over a horizontal line.

Robert D. Bailey,
Solid Waste Superintendent

RDB:rs

c: Kenneth V. Payne, Utilities Director
Dan Olson, Assistant Utilities Director



City of Sacramento
Public Works Department

2812 Meadowview Road
Sacramento, CA 95832

Solid Waste Division

(916) 433-4900
(916) 433-4999 fax

May 20, 2003

Mr. Patrick M. Quinn
Planning Program Manager
Department of Waste Management & Recycling
County of Sacramento
9850 Goethe Road
Sacramento, CA 95827-3561

RE: Countywide Integrated Waste Management Plan Five-Year Review

Dear Mr. Quinn:

With reference to your letter of April 4, regarding the County's Five-Year Review of the Countywide Integrated Waste Management Plan (CIWMP), the City of Sacramento has reviewed its Source Reduction and Recycling Element (SRRE), Household Hazardous Waste Element (HHWE), and Non-Disposal Facilities Element (NDFE).

The City has continued to implement and enhance the operations of the programs and facilities described in these elements. The City updates these plans through the AB 939 annual reports submitted to the California Integrated Waste Management Board. Because of the on-going operations, implementation of programs, and reporting procedures, the City does not believe that a revision is necessary at this time.

If you have any additional questions regarding this information, please do not hesitate to contact me at (916) 433-4934.

Sincerely,

Colleen Laubinger
Integrated Waste Planning Superintendent

Cc: G. Harold Duffey, Solid Waste Division Manager
File PL-2 County Integrated Waste Management Plan



June 6, 2003

Mr. Patrick M. Quinn
Planning Program Manager
Department of Waste Management & Recycling
County of Sacramento
9850 Goethe Road
Sacramento, California 95827-3561

RE: Countywide Integrated Waste Management Plan Five-Year Review

Dear Mr. Quinn:

I want to acknowledge receipt of your April 4th memorandum regarding the subject matter.

Through the assistance of an independent consultant (Jim Greco, California Waste Associates), the City of Galt has reviewed its AB 939 plans annually. As you are likely aware, these plans include:

- Source Reduction and Recycling Element;
- Household Hazardous Waste Element; and
- Nondisposal Facility Element.

The City has updated these plans through their AB 939 annual reports submitted to the California Integrated Waste Management Board and does not feel that a revision is necessary at this time.

If you need any additional information, please contact me.

Sincerely,

Ted C. Anderson, City Manager

cc Jim Greco, California Waste Associates



COUNTY OF SACRAMENTO
PUBLIC WORKS AGENCY – Warren H. Harada, Administrator

Department of Waste Management & Recycling

David A. Pelsler, Director

9850 Goethe Road
Sacramento, CA 95827-3561
Phone: (916) 875-6789
Fax: (916) 875-6767
www.sacgreenteam.com

Richard D. Owings, Division Chief
John Abernethy, Landfill/Transfer Operations
Dick Lockhart, Collection Operations
Carol Mosier, Finance/Administration
Chris Richgels, Engineering/Planning

June 25, 2003

Mr. Jim Greco
California Waste Associates
P.O. Box 5177
El Dorado Hills, CA 95762

Subject: Countywide Integrated Waste Management Plan (CIWMP) Five-Year Review

Dear Mr. Greco,

In accordance with Public Resources Code 41770 and 41822, and California Code of Regulations, Title 14, § 18788, the County of Sacramento, on behalf of the Sacramento County/City of Citrus Heights Regional Agency (Regional Agency), has reviewed the planning documents that comprise the Countywide Integrated Waste Management Plan. The planning documents that the Regional Agency is responsible for reviewing include the following:

- Source Reduction and Recycling Element (SRRE);
- Household Hazardous Waste Element (HHWE);
- Non-Disposal Facilities Element (NDFE);
- Summary Plan (SP); and
- Countywide Siting Element (CSE)

The Regional Agency updates these plans through the AB 939 annual report submitted to the California Integrated Waste Management Board (CIWMB) and therefore does not feel that a revision of the required plan elements is necessary at this time.

However, the Regional Agency foresees a funding problem that, if left unresolved, may impact our ability to continue or enhance the AB 939 programs outlined in these planning documents. As more cities incorporate within Sacramento County, the Regional Agency has the potential to lose significant revenue from residential ratepayers when new cities choose not to contract with the County for residential garbage, green waste, and mixed recycling services. Another potential loss occurs when newly incorporated cities choose not to join the Sacramento Regional Solid Waste Authority (SWA), therefore reducing the franchise fee revenue from commercial solid waste collection in that jurisdiction. We currently rely on these revenue sources to help

June 25, 2003

Page 2 of 2

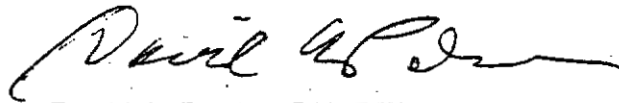
fund regional costs such as landfill remediation, closure, and post-closure maintenance, as well as illegal dumping, and HHW and E-Waste collection. As these revenue sources continue to decrease, the costs to the Regional Agency remain the same, which may eventually impact the ability to fund AB 939 programs.

Additionally, we are concerned about the need for a regionally coordinated integrated waste management disaster plan. While a disaster plan is not a required element of the CIWMP, we suggest the CIWMP five-year review as an opportunity for the jurisdictions within Sacramento County to develop a coordinated regional approach to recycling and disposal alternatives that may be necessary in the event of a disaster.

The Regional Agency intends to work with the other jurisdictions in Sacramento County to develop regional solutions to these issues. Our hope is to preserve funding for the Regional Agency's AB 939 programs and to develop a regional integrated waste management disaster plan that will provide the mechanisms needed to maintain a high level of diversion during a disaster.

If you have any questions, please contact Pat Quinn at (916) 875-7082.

Respectfully,

A handwritten signature in black ink, appearing to read "David A. Pelser", with a long horizontal flourish extending to the right.

David A. Pelser, PE, DEE
Director

